

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**JOSE ABRAHAM NICANOR**

§  
§  
§  
§  
§

**CRIMINAL NO. 4:20-cr-00264**

**GOVERNMENT'S OFFER OF TRIAL EXHIBITS  
PURSUANT TO LOCAL RULE CrLR 55.2**

TO THE HONORABLE JUDGE HOYT:

COMES NOW the United States of America, by and through Alamdar Hamdani, United States Attorney in and for the Southern District of Texas, and Lisa M. Collins, Assistant United States Attorney, and files this offer of trial exhibits pursuant to local rule CrLR 55.2.

I.

CrLR 55.2 provides in pertinent part:

**Authentication of Exhibits.** A party requiring authentication of an exhibit must notify the offering party in writing within 7 days after the exhibit is listed and made available. Failure to object in advance of trial in writing concedes authenticity.

**Objections to Exhibits.** Objections to admissibility of exhibits must be made at least 7 days before trial by notifying the Court in writing of the disputes, with copies of the disputed exhibit and authority.

II.

The Government intends to introduce, among other things, the exhibits listed in the attached Government's Exhibit List.

III.

The exhibits have been made available via either the United States Attorney's Office file exchange system as of May 2, 2023, in hard copies, or through email.

WHEREFORE, PREMISES CONSIDERED, the Government requests that the defendant comply with CrLR 55.2.

Respectfully submitted,

ALAMDAR HAMDANI  
United States Attorney

/s/ Lisa M. Collins

Lisa M. Collins  
Assistant United States Attorney  
1000 Louisiana  
Suite 2300  
Houston, Texas 77002  
713-567-9700

**CERTIFICATE OF SERVICE**

On May 2, 2023 the Government served a copy of its Offer of Trial Exhibits Pursuant to CLR 55.2 by ECF upon defense counsel.

/s/ Lisa M. Collins

Lisa M. Collins  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
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**UNITED STATES OF AMERICA**

**vs.**

**JOSE ABRAHAM NICANOR**

§  
§ **Criminal No. 4:20-cr-00264**  
§  
§ **KENNETH HOYT**  
§ **JUDGE**  
§  
§  
§ **COURTROOM CLERK**  
§  
§  
§ **COURT REPORTER**  
§

**GOVERNMENT'S EXHIBIT LIST**

<b>NO.</b>	<b>DESCRIPTION</b>	<b>OFFER</b>	<b>OBJ</b>	<b>ADMIT</b>	<b>N/ADM</b>
1	4473- JJ 2.16.19	Yes/No	Yes/No		
2	4473- JJ 4.9.19	Yes/No	Yes/No		
3	4473- JJ 4.12.19	Yes/No	Yes/No		
4	4473- JJ 4.15.19	Yes/No	Yes/No		
5	4473- JJ 4.17.19	Yes/No	Yes/No		
6	4473- JJ 4.18.19	Yes/No	Yes/No		
7	4473- AG 3.9.19	Yes/No	Yes/No		
8	4473- AG 3.20.19	Yes/No	Yes/No		
9	4473- AG 3.29.19	Yes/No	Yes/No		
10	4473- AG 4.8.19	Yes/No	Yes/No		
11	4473- AG 4.12.19	Yes/No	Yes/No		
12	50 CAL- demonstration only	Yes/No	Yes/No		
13	50 CAL AMMO- demonstration only	Yes/No	Yes/No		
14	Nicanor Instagram BRA and attached documents	Yes/No	Yes/No		
15	Video from Top Gun	Yes/No	Yes/No		
16	Felony Stipulation	Yes/No	Yes/No		
17	Top Gun BRA and supporting docs	Yes/No	Yes/No		

18	Top Gun Customer Screen shot	Yes/No	Yes/No		
19	Jefferson BRA and CDRs	Yes/No	Yes/No		
20	Garcia BRA and CDRs	Yes/No	Yes/No		
21	Nicanor BRA and CDRs	Yes/No	Yes/No		
22	Contact List Chart				
23	Call Frequency Chart	Yes/No	Yes/No		
24	Jefferson Phone	Yes/No	Yes/No		
25	Nicanor Phone	Yes/No	Yes/No		
26	Garcia Phone	Yes/No	Yes/No		
27	Powerpoint of Counts	Yes/No	Yes/No		
28	Photo of 57				
29	Photo of Ammo box				
30	Photo of Ammo Box 2				
31	Top Gun Waiver				